

PRESENTMENT DATE AND TIME: January 8, 2015 at 12:00 noon (Eastern Standard Time)
OBJECTION DATE AND TIME: January 8, 2015 at 11:30 a.m. (Eastern Standard Time)

KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
Arthur Steinberg
Scott Davidson

KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Richard C. Godfrey, P.C. (admitted *pro hac vice*)
Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> , f/k/a General Motors Corp., <i>et al.</i>	:	Case No.: 09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)

NOTICE OF PRESENTMENT OF ORDER GRANTING APPLICATION BY GENERAL MOTORS LLC TO ENFORCE THE COURT'S JULY 8, 2014 ORDER ESTABLISHING STAY PROCEDURES FOR NEWLY-FILED IGNITION SWITCH ACTIONS AS IT APPLIES TO DANNY E. BROCHEY, CHERYL A. BROCHEY, DANIEL J. MATTEO, AND STARLEEN E. MATTEO

PLEASE TAKE NOTICE that, based on the annexed Application, dated January 5, 2015 ("Application"), the proposed *Order Granting Application By General Motors LLC To Enforce The Court's July 8, 2014 Order Establishing Stay Procedures For Newly-Filed Ignition Switch Actions As It Applies To Danny E. Brochey, Cheryl A. Brochey, Daniel J. Matteo, and Starleen E. Matteo*, a copy of which is annexed to the Application as Exhibit 7, will be presented

for signature and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **January 8, 2015 at 12:00 noon (Eastern Standard Time)**.

PLEASE TAKE FURTHER NOTICE that objections or proposed counter-orders must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq.); and (ii) Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654 (Attn: Richard C. Godfrey, Esq.), so as to be received no later than **January 8, 2015, at 11:30 a.m. (Eastern Standard Time) ("Objection Deadline")**.

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed before the Objection Deadline, the Court may schedule a hearing thereon at a date and time to be determined, if it believes such hearing is necessary under the circumstances.

Dated: New York, New York
January 5, 2015

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg
Scott Davidson
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

-And-

Richard C. Godfrey, P.C. (admitted *pro hac vice*)
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Attorneys for General Motors LLC